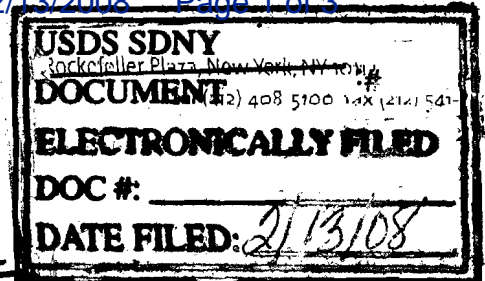
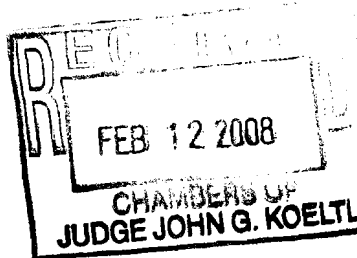


CHADBOURNE  
& PARKE LLP

Mary T. Yelenick  
direct tel (212) 408-5400  
myelenick@chadbourne.com



MEMO ENDORSED

February 12, 2008

Honorable John G. Koeltl  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 1030  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED

VIA FACSIMILE: (212) 805-7912

2/12/08 John G. Koeltl, U.S.D.J.

Re: Request for Permission to File Memoranda of Law in Excess of 10 Pages:

*New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund v. Purdue Pharma,*  
Civil Action No. 07-cv-6916-JGK

*American Federation of State, County and Municipal Employees, District Council 47 Health and Welfare Fund et al. v. Purdue Pharma,*  
Civil Action No. 07-cv-8761-JGK

Dear Judge Koeltl:

Defendants Purdue Pharma L.P., Purdue Pharma, Inc., The P.F. Laboratories, Inc. and The Purdue Frederick Company Inc. (the "Purdue Defendants") respectfully request permission to exceed the 10 page limit applicable under the Court's Individual Practices with respect to the reply briefs that the Purdue Defendants intend to file in further support of their Rule 12(c) motions for judgment on the pleadings, which are due in the above-referenced matters on February 19, 2008. (Case Management Order (12/14/07) [Doc. 59].)

Additional pages are necessary because, as the Purdue Defendants indicated in their December 24, 2007 letter to the Court, both Complaints are quite broad in scope, complex in nature, set forth multiple theories of recovery, and involve the alleged conduct of several parties over a long period of time and, because these cases involve third-party payor claims against the manufacturer of an FDA-approved prescription drug, they raise complex issues of standing, federalism, statutory interpretation, and state and federal public policy. For these reasons, the Court previously permitted the Purdue Defendants, in their opening briefs, to exceed the Court's 25-page limit by up to 10 (ten) pages in the *New Mexico Fund* matter (for a total of 35 pages), and by up to 5 (five) pages in the *American Federation Fund* matter (for a total of 30 pages), and Plaintiffs received corresponding page extensions for their Opposition briefs.

CHADBOURNE  
& PARKE LLP

Honorable John G. Koehl

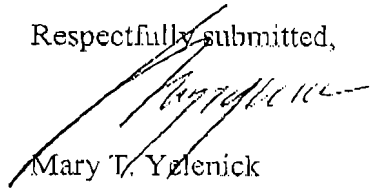
-2-

February 12, 2008

Faced with the task of responding to the arguments stated in Plaintiffs' 35-page Opposition brief in the *New Mexico Fund* matter and 26-page Opposition brief in the *American Federation Fund* matter, the Purdue Defendants respectfully request that the Court enter an order allowing the Purdue Defendants to exceed the Court's 10-page limit for reply briefs by up to 5 (five) pages (for a total of 15 pages) in the *New Mexico Fund* matter and by up to 5 (five) pages (for a total of 15 pages) in the *American Federation Fund* matter. The individual defendants will also be filing a reply brief in the *New Mexico Fund* matter, which will be short and non-repetitive.

I have consulted with counsel for the Plaintiffs in both cases; they have authorized me to say that they do not object to this request.

Respectfully submitted,

  
Mary T. Yelenick

cc: Counsel for Plaintiffs and the Class

Christopher A. Seeger  
David R. Buchanan  
Seeger Weiss, LLP  
One William Street  
New York, NY 10004

VIA FACSIMILE: (212) 584-0799  
(and also via e-mail to D. Buchanan)

Jonathan Shub  
TerriAnne Benedetto  
Seeger Weiss, LLP  
1515 Market Street  
Suite 1360  
Philadelphia, PA 19106

VIA FACSIMILE: (215) 851-8029

James R. Dugan, II  
Douglas R. Plymale  
Stephen B. Murray, Jr.  
Stephen B. Murray, Sr.  
Murray Law Firm  
650 Poydras Street  
Suite 2150  
New Orleans, LA 70130

VIA FACSIMILE: (504) 648-0181  
(and also via e-mail to J. Dugan)

CHADBOURNE  
& PARKE LLP

Honorable John G. Koeltl

-3-

February 12, 2008

Arnold Levin  
Fred Longer  
Charles Schaffer  
Levin, Fishbein, Sedran & Berman  
510 Walnut Street, Suite 500  
Philadelphia, PA 19106

VIA FACSIMILE: (215) 592-4663

Arthur Sadin  
Sadin Law Firm  
121 Magnolia  
Suite 102  
Friendswood, TX 77546

VIA FACSIMILE: (281) 648-7799

Shane Youtz  
Youtz & Valdez, P.C.  
420 Central Avenue, SW  
Albuquerque, NM 87102

VIA FACSIMILE: (505) 244-9700

Stewart L. Cohen  
Cohen Placitella & Roth  
Two Commerce Square  
Suite 2900  
2001 Market St.  
Philadelphia, PA 19103

VIA FACSIMILE: (215) 567-6019

Steven A. Schwartz  
Chimicles & Tikellis, LLP  
361 W. Lancaster Avenue  
Haverford, PA 19041

VIA FACSIMILE: (610) 649-3633

cc: Counsel for the Abbott Defendants.

M. King Hill, III  
Venable LLP  
PNC Bank Building  
Two Hopkins Plaza  
Suite 1800  
Baltimore, MD 21201

VIA FACSIMILE: (410) 244-7742